

**VIA CM/ECF FILING**

September 10, 2021

The Honorable Virginia K. DeMarchi  
Robert F. Peckham Federal Building  
Courtroom 2 – 5th Floor  
280 South 1st Street  
San Jose, CA 95113

Re: Joint Discovery Letter Informing the Court of Agreement on Privilege Log Exchange Dates  
in Maximilian Klein et al. v. Facebook, Inc., Case No. 5:20-cv-08570-LHK (N.D. Cal.)

Dear Judge DeMarchi:

Pursuant to the Court’s instructions in its September 3, 2021 Interim Discovery Order, ECF No. 145, the parties in the above captioned matter (“Parties”) write to inform the Court that they have reached an agreement on a schedule for exchanging privilege logs. The agreed schedule is:

- Exchange of interim privilege log 1: Thursday, January 20, 2022 (covering productions made on or before December 3, 2021);
- Exchange of interim privilege log 2: Thursday, April 7, 2022 (covering productions made on or before February 21, 2022);
- Exchange of interim privilege log 3: Wednesday, June 15, 2022 (covering productions made on or before May 1, 2022);
- For any productions that occur after May 1, 2022, the production of a privilege log will occur promptly, but in no event more than 60 days after a given production, unless otherwise agreed by the parties.

Absent an order to the contrary from the Court, the Parties intend to memorialize this agreement as part of the Joint Stipulated Privilege Protocol they will submit for the Court’s consideration after the Parties or the Court have resolved the remaining disputed issues in that Protocol.

DATED: September 10, 2021

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Respectfully submitted,

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**ATTESTATION OF STEPHEN SWEDLOW**

This document is being filed through the Electronic Case Filing (ECF) system by attorney Stephen Swedlow. By his signature, Mr. Swedlow attests that he has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: September 10, 2021

By: /s/ Stephen A. Swedlow  
Stephen A. Swedlow

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of September 2021, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System, causing the document to be electronically served on all attorneys of record.

Dated: September 10, 2021

By: /s/ Stephen A. Swedlow  
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